

November 22, 2023

**VIA ECF (W/COURTESY COPY VIA EMAIL: [chambersnysdseibel@nysd.uscourts.gov](mailto:chambersnysdseibel@nysd.uscourts.gov))**

Hon. Cathy Seibel, U.S.D.J.  
Charles L. Brieant Jr. Federal Building & U.S. Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.***  
**Case No. 7:13-cv-09239-CS-PED**

Dear Judge Seibel:

We represent Defendants SIGNATURE TRAVEL NETWORK COOPERATIVE, INC. ("SIGNATURE"),<sup>1</sup> FROSCH INTERNATIONAL TRAVEL, INC. ("FROSCH")<sup>2</sup> and TZELL TRAVEL, LLC ("TZELL")<sup>3</sup> in the above-identified action. We write pursuant to the Court's November 7, 2023 Order (Dkt. 296)<sup>4</sup> instructing defendants to state their positions concerning Plaintiff's intended Motion to Lift the Stay.

SIGNATURE, FROSCH and TZELL agree with and join the position letter filed today by defendants GETAROOM.COM and KAYAK SOFTWARE CORP. D/B/A KAYAK.COM2 (Dkt. 303) (the "KAYAK Letter"). Our clients were not parties to the Singapore action and are not privy to the scope of what was asserted by Plaintiff and ultimately resolved in the Singapore action (e.g., whether the photographs at issue in the Singapore action included the specific photographs that Plaintiff has asserted against defendants in this action). Nor are our clients privy to what extent, if any, GHM's confidential settlement with Plaintiff impacts any claims that Plaintiff has asserted against our clients in this action.

Accordingly, to avoid prejudice and provide for the efficient management of this action, Defendants SIGNATURE, FROSCH and TZELL respectfully request that the Court adopt the procedure specified in the KAYAK letter (Dkt. 303) as a prerequisite to lifting the stay in this action.

Respectfully submitted,



Kenneth S. Weitzman

cc: All counsel of record (via ECF)

<sup>1</sup> SIGNATURE was identified in the original and amended complaints as "Signature Travel Network d/b/a Signaturetravelnetwork.com."

<sup>2</sup> FROSCH was identified in the original and amended complaints as "Frosh[sic] International Travel, Inc. d/b/a Froschvacations.com."

<sup>3</sup> TZELL was identified in the original and amended complaints as "Vacations by Tzell d/b/a Vacationsbytzell.com."

<sup>4</sup> "Dkt. \_\_\_" refers to the corresponding ECF docket entry in *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*, Case No. 7:13-cv-09239-CS-PED.